

# INTERTIDAL AQUAFARMS, INC

1011 Lewis Circle  
Santa Cruz, CA 95062  
408-476-4187

eMail : wcalla9642@aol.com

web site : <http://www.mon-ami.com/intertidal/index.htm>

Mr. William K. Hubbard  
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re : Federal Register Request for Information : Performance Standard for *Vibrio vulnificus*  
Docket Number 98P-0504 -Volume 64, Number 13, Page 3300-3301

Dear Mr. Hubbard :

The FDA has requested 8 points of interest in regards to issues raised by a petition from the Center for Science in the Public Interest. I would like my comments added to the record.

I was a shellfish farmer for nearly 20 years and I still market live shellfish to the public for a few west coast shellfish farming operations. I am incensed and outraged that a single interest group may potentially have such a profoundly negative effect on :

1. the commercial shellfish industry;
2. the rights of the public to have available to them unadulterated seafoods;
3. the public's perception of the relative safety of shellfish compared to other whole foods; and
4. the blatant manipulation of a public agency to produce bad public policy based on faulty or non scientific evidence.

I urge and insist that the FDA follow the recommendations of the ISSC, use the good science research techniques that has served the public so well to date, and not allow one group to push its agenda onto the public's right to purchase safe foods that are not adulterated. I know the risks of eating raw shellfish, so do my customers. Our job is to educate, research, and present the facts to the public so THEY can make their best informed choice about their diet.

Sincerely,

98P-0504  
*Bill Callahan, President*

C 52



IAR  
1011 Lewis Circle  
Santa Cruz CA  
95062



William K Hubbard  
DOCKETS MANAGEMENT BRANCH  
Food + Drug Admin. CHFA-305  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852